

MICHAEL E. MOSS 63408  
HENRY Y. CHIU 222927  
KIMBLE, MacMICHAEL & UPTON  
A Professional Corporation  
5260 North Palm Avenue, Suite 221  
Fresno, California 93704-2215  
Telephone: (559) 435-5500  
Facsimile: (559) 435-1500

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

\* \* \*

BOARD OF TRUSTEES OF THE PIPE  
TRADES DISTRICT COUNCIL NO. 36  
HEALTH AND WELFARE TRUST FUND;  
BOARD OF TRUSTEES OF THE PIPE  
TRADES DISTRICT COUNCIL NO. 36  
PENSION TRUST FUND; BOARD OF  
TRUSTEES OF THE PIPE TRADES  
DISTRICT COUNCIL NO. 36 APPRENTICE  
TRAINING TRUST FUND; BOARD OF  
TRUSTEES OF THE CENTRAL  
CALIFORNIA PIPE TRADES INDUSTRY  
LABOR-MANAGEMENT COOPERATION  
COMMITTEE TRUST FUND,

Plaintiffs,

v.

RUTLEDGE PLUMBING, INC., a California  
corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No. CV-08-3530 WHA

STIPULATION FOR ENTRY OF  
JUDGMENT

IT IS HEREBY STIPULATED AND AGREED by and between the above named  
Plaintiffs and defendant Rutledge Plumbing, Inc. ("Defendant") as follows:

1. This stipulation is entered into between the parties in order to settle and conclude  
the above-entitled litigation relating to the payment of fringe benefit contributions owed by  
Defendant to Plaintiffs for the months of April 2008 and May 2008, as well as for the month of  
June 2008.

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2. Accordingly, IT IS HEREBY STIPULATED that, subject to the approval and order of the Court, judgment be entered in favor of Plaintiffs and against Defendant, effective upon the date this order is executed by the Court, in the sum set forth in Exhibit "A" (entitled "Judgment Pursuant to Stipulation"), which is attached hereto and incorporated herein by reference. Such sum comprises the full principal amount of delinquent contributions, liquidated damages, interest, and costs and attorneys' fees incurred by Plaintiffs to date.

3. IT IS STIPULATED, however, that judgment pursuant to this Stipulation shall be satisfied upon payment pursuant to the following terms:

a. Defendant shall remit a personal check, certified check or money order to Plaintiffs no later than September 5, 2008, in the amount of \$52,883.37, which shall comprise the following:

Principal contributions:	\$48,649.39
Interest (excluding liquidated damages):	\$1,063.86
Costs and Attorneys' Fees:	\$3,170.12

b. Pursuant to the terms of the Trust Agreements between Plaintiffs and Defendant, Defendant shall submit all future monthly reports in a timely manner, and pay all fringe benefit contributions to Plaintiffs on or before the date they are due.

4. Failure to make the payment described in Paragraph 3 above, or failure to submit future monthly reports, all in a timely manner, shall be considered an event of default under this Stipulation. Any default shall entitle Plaintiffs to execute the judgment attached hereto as Exhibit "A" for the full amount of \$63,431.80. Furthermore, upon default, Plaintiffs shall be entitled to apply to the court ex parte, and without notice to Defendant, for any writs or orders necessary to judicially enforce the full amount of the judgment stated in Exhibit "A."

5. Any execution of judgment entered pursuant to this Stipulation is subject to offsets from payments made prior to said execution of the judgment. Upon the successful completion of the payments and conditions stated in Paragraph 3 of this Stipulation, Plaintiffs shall submit an appropriate satisfaction of judgment to the Court.

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1 Dated: August 29, 2008.

PIPE TRADES DISTRICT COUNCIL NO. 36  
TRUST FUNDS

2  
3 By /s/ Robert Jennings  
4 ROBERT JENNINGS, Trustee of the  
5 PIPE TRADES DISTRICT COUNCIL NO. 36,  
6 On behalf of the same

7 Dated: August 31, 2008.

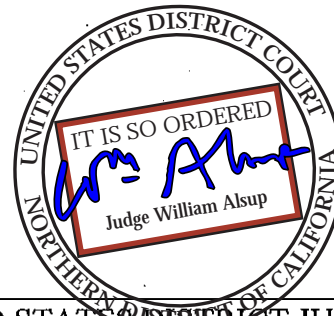
RUTLEDGE PLUMBING, INC.

8 By /s/ Karen M. Rutledge  
9 KAREN M. RUTLEDGE, President of  
10 RUTLEDGE PLUMBING, INC.,  
11 On behalf of the same

12  
13  
14 IT IS SO ORDERED.

15 Dated: September 30, 2008.

ORDER



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17  
18 UNITED STATES DISTRICT JUDGE

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27 615121.hc.stip entry judgment.2

1 Dated: August 29, 2008.

PIPE TRADES DISTRICT COUNCIL NO. 36  
TRUST FUNDS

2  
3 By 

4 ROBERT JENNINGS, Trustee of the  
5 PIPE TRADES DISTRICT COUNCIL NO. 36,  
6 On behalf of the same

7 Dated: August \_\_\_\_\_, 2008.

RUTLEDGE PLUMBING, INC.

8  
9 By \_\_\_\_\_

10 KAREN M. RUTLEDGE, President of  
11 RUTLEDGE PLUMBING, INC.,  
12 On behalf of the same

13 ORDER

14 IT IS SO ORDERED.

15 Dated: September \_\_\_\_\_, 2008.

16  
17  
18 UNITED STATES DISTRICT JUDGE

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26  
27 615121.hc.stip entry judgment.2

1 Dated: August \_\_\_\_, 2008.

PIPE TRADES DISTRICT COUNCIL NO. 36  
TRUST FUNDS

3 By

ROBERT JENNINGS, Trustee of the  
PIPE TRADES DISTRICT COUNCIL NO. 36,  
On behalf of the same

6  
7 Dated: August 31, 2008.

RUTLEDGE PLUMBING, INC.

8  
9 By

KAREN M. RUTLEDGE, President of  
RUTLEDGE PLUMBING, INC.,  
On behalf of the same

13 ORDER

14 IT IS SO ORDERED.

15 Dated: September \_\_\_\_, 2008.

18 UNITED STATES DISTRICT JUDGE

27 615121.hc.stip entry judgment.2

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NORTHERN DISTRICT OF CALIFORNIA

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Defendants.

Case No. CV-08-3530 WHA

JUDGMENT PURSUANT TO  
STIPULATION

[Exhibit A to Stipulation for Entry of  
Judgment]

On the basis of the stipulation entered into between Plaintiffs and defendant Rutledge Plumbing, Inc. ("Defendant"), and good cause appearing therefore:

IT IS HEREBY ORDERED that judgment be entered in the above-entitled matter in favor of Plaintiffs and against Defendant in the total sum of \$63,431.80. This amount comprises the following, all for the period of April 2008 through June 2008 only:

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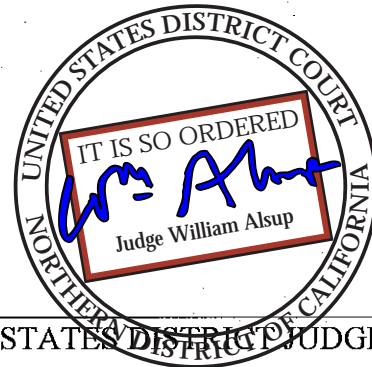
1. Principal unpaid contributions, in the amount of \$48,649.39;
2. Interest upon the principal unpaid contributions, in the amount of \$1,063.86;
3. Liquidated damages, in the amount of \$9,344.53;
4. Interest upon the liquidated damages, in the amount of \$203.90;
5. Costs and attorneys' fees, in the amount of \$4,170.12;

IT IS FURTHER ORDERED that interest shall accrue on the total judgment, from the date of entry, at the rate of ten percent (10%) per annum.

IT IS FURTHER ORDERED that Plaintiffs shall be entitled to recover reasonable costs and attorneys' fees incurred by them in enforcing this judgment.

IT IS FURTHER ORDERED that the Court shall retain jurisdiction to enforce the terms of this judgment.

Dated: September 30, 2008.



UNITED STATES DISTRICT JUDGE